



COLLEGE OF FINE ARTS

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January 8, 2015

Dear FCC,

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 via Electronic Filing

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, O'Rielly and Ms. Dortch,

On behalf of Arkansas State University - Jonesboro, I write with concern about protection for our wireless microphones and backstage communications devices. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students.

Arkansas State University presents twenty-four public performances a year, with more than 6,000 attendees annually. Our school theatre program relies on the revenue generated in these performances to sustain and grow our in- and after-school theatre education opportunities for all of our seventy students. Wireless microphones are a fundamental aspect of our program, and understanding how to use them a critical component of our educational pedagogy, both for student performers and technicians.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my school and thousands of others without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you are unaware of them.



Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns.

Per the FCC's request for Public Comment, here are the details about our school's use of wireless devices:

- What type of wireless devices do you use? 10 microphones
- How many units do you use in a typical presentation or performance? Approximately five
- How frequently do you offer presentations that use wireless devices? Six times a year
- What bands and channels do you use?
 - Low UHF 518-578MHz
 - Are your microphones able to tune to more than one frequency? Yes
 - How wide is their tuning ability? 60MHz
- Which of your wireless devices are analog and which are digital? All are digital
- Do you own or rent your wireless equipment? Own
- For equipment that you own, what is its reasonable life expectancy? 25 years
- How did you handle the move out of the 700 MHz band? We informed the university that our microphones were in at a frequency we were no longer allowed to use and two years later we were given money to purchase new microphones.
 - How much did it cost? \$35,000
 - How long did it take for you to retune or replace all of your devices? Two years
- What can the FCC do to ensure that wireless microphone users transition to new, more efficient devices to the full extent possible? Reimbursement of the expense and ensure that the quality of the new devices meet acceptable performance standards.
- What would persuade you to move out of the TV band? Reimbursement of the expense and ensure that the quality of the new devices meet acceptable performance standards.

I appreciate that the Commission has sought comment on these very important issues. I realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow *all* organizations—big and small, professional and educational—that some sort of interference protection. The currently proposed plan offers no such protection for many of us. Further, I would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21st-century skills and knowledge for students and providing pride, entertainment, and dialogue in the communities, and contribute to the local economies. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse educational and performing arts organizations for the cost of new equipment prompted by any proposed spectrum move.

Sincerely,



Jeff McLaughlin
Assistant Professor of Theatre